

**TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.**

ATTORNEYS AT LAW  
40 EXCHANGE PLACE  
18TH FLOOR  
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE  
(212) 482-1303 FAX  
WWW.TALKINLAW.COM  
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:  
5100 DORSEY HALL DRIVE  
SUITE 100  
ELLCOTT CITY, MD 21042  
410-964-0300

NEW JERSEY OFFICE:  
2500 PLAZA 5  
HARBORSIDE FINANCIAL CENTER  
JERSEY CITY, NJ 07311  
201-342-6665

June 14, 2021

Honorable Margo K. Brodie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday  
20 Cr. 008 (MKB)

Dear Judge Brodie:

Defendant Michael Hlday (“Hlday”) is currently at liberty on a bond that contains numerous conditions including electronic monitoring. Tomorrow, Tuesday, June 15, 2021, Hlday is scheduled to undergo an MRI that requires removal of his location monitoring bracelet. Similar to the procedure that took place last week, Pretrial Services (“Pretrial”) has advised me that upon permission of the Court, Hlday can make arrangements with Pretrial in his supervising district for the removal and prompt reattachment of the device. Accordingly, defendant respectfully requests that the Court permit removal of the bracelet on June 15, 2021 as directed by Pretrial. The government, by Assistant United States Attorney Mark Bini, and Pretrial, by United States Pretrial Officer, Ramel Moore, consent to this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,  
*Sanford Talkin*  
Sanford Talkin

cc: AUSA Sarah Evans (by ECF)  
AUSA Mark Bini (by ECF)  
USPTO Ramel Moore (by email)